



REPLY TO THE ATTENTION OF:

230188

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II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# ILR000065540

A. Physical Location and Site Description

The GCT staging/work area was located at the Waste Management, Inc. Chain of Rocks landfill in Granite City, Madison County, Illinois (Figure 1). Geographical coordinates for the staging/work area are latitude 38°45.481' North and longitude 90°9.220' West. It should be noted that Waste Management, Inc., was not the cause of the emergency response, rather they provided a secure location for U.S. EPA to conduct emergency response activities. The landfill is located on the Chouteau Island. The Chain of Rocks Canal is located approximately 0.5 mile east of the staging/work area and the Mississippi River is located approximately 0.75 mile west of the staging/work area. The landfill is located on Chain of Rocks Road approximately 1 mile east of State Route 3. The nearest residence is located approximately 0.75 mile to the east. Granite City is supplied drinking water by intakes on the Mississippi River. The staging/work area was located on a concrete drive on the active landfill, which is fenced and secured from the public.

The abandoned trailer was a 50-foot flat bed (low boy) trailer which contained 27 drums and thousands of miscellaneous smaller containers. The flat bed trailer was open on the top and sides, with the containers exposed to the environment.

The area around the Chain of Rocks landfill has a low-income percentage of 5.7% and a minority percentage of 1.5% as determined by Landview III EJ analysis. Therefore, this Site does not meet the region's EJ criteria based on demographics as identified in "Region 5 Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998".

B. Site Background

Roger Kieffer, the potentially responsible party (PRP), states that he abandoned the trailer in the Canal Motel parking lot on Chain of Rocks Road, located approximately 1 mile east of the landfill around June 7th 1999. On June 9th and 10th Illinois EPA and the Illinois State Police stated that they contacted the PRP to see if he would take responsibility for proper disposal. On June 11, 1999, Illinois EPA contacted U.S. EPA to look into the situation. OSC Turner notified the PRP of the hazards associated with the abandoned trailer. The PRP stated he lacked the resources to adequately dispose of the wastes. OSC Turner contacted personnel at the Chain of Rocks landfill, owned by Waste Management, Inc., to determine if the landfill could provide a secure work area at which U.S. EPA could complete removal activities. Waste Management, Inc., agreed to allow U.S. EPA to store the trailer and complete the removal on the landfill property. The Illinois State Police transported the trailer from the motel parking lot to the landfill.

On June 16, 1999, OSC Turner, START, and the Emergency and Rapid Response Services (ERRS) contractor Environmental Restoration L.L.C. (ER), mobilized to the staging/work area. ER removed waste materials from the trailer and staged them on poly liners on the concrete drive at the Chain of Rocks Landfill staging/work area. Drums which were deteriorated or visibly leaking were immediately placed in 85-gallon steel drums. Miscellaneous containers were roughly segregated into waste type (i.e. flammable, acidic, basic) and by manufacturer/distributor information. START hazcatted waste material in the miscellaneous containers.

On June 17, 1999, ER sampled material from drums found on the trailer. START hazcatted material removed from the drums. On June 18, 1999, ER collected six samples based on hazcat results. Sample WS-1 was a composite from nine drums found on the abandoned trailer which were hazcatted as flammable paint-related material. Sample WS-2 was a composite from eight drums that were hazcatted as flammable fuels. Sample WS-3 was collected from drum 5 that was hazcatted as a flammable paint-related material suspected to contain metals. Sample WS-4 was a composite of three drums that were hazcatted as basic liquids. Sample WS-5 was collected from drum 23 that was labeled as a solution of hydrochloric acid. Sample WS-6 was collected from a drum that contained an asphalt-like material and a liquid that were hazcatted as a nonhazardous solid and nonhazardous liquid, respectively. ER delivered the samples to Quanterra Laboratory in St. Louis, Missouri. ER placed miscellaneous containers on pallets or in 55-gallon steel drums based on hazcat results and/or distributor/manufacturer information.

OSC Turner contacted manufacturers and distributors of material found on the trailer and requested that they remove their products. On June 22, 1999, representatives from Goedecke, Sika, Master Builders, and General Electric, as well as several others, removed their products from the staging/work area.

On July 19, 1999, representatives from Tri State Motor Transit Company arrived to remove wastes from the abandoned trailer. The wastes were transported to WRR Environmental Services Company, Inc., located in Eau Claire, Wisconsin.

These cleanup activities were discussed and coordinated with Tom Miller and Tom Powell of the Illinois EPA's Collinsville, IL, office.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Granite City Trailer site presented an imminent and substantial threat to the public health, or welfare, and the environment and met the criteria for a removal action provided for in the National Contingency Plan (NCP), Section 300.415, Paragraph (b)(2). 40 C.F.R. § 300.415(b)(2)(i), (iii) and (v), respectively, specifically allows removal actions for:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

The Granite City Trailer emergency response consisted of properly staging and disposing of wastes found in a trailer abandoned in a motel parking lot. The 50-foot flat bed (low boy) trailer contained 27 drums and thousands of miscellaneous smaller containers. Several drums were labeled corrosive, flammable, or paint waste. Some of the miscellaneous containers were labeled corrosive, corrosive toxic, flammable, or combustible. Many of the drums and containers were deteriorated and visibly leaking. The flat bed trailer was open on the top and sides, with the containers exposed to the environment. Rainfall, thermal expansion of wastes, or severe weather events could have caused additional releases into the environment. In addition, before moving the trailer to a secure location access was unrestricted and there was potential for vandalism.

- 2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

The flat bed trailer was open on the top and sides, with the containers exposed to the environment. Many of the drums and containers were deteriorated and visibly leaking and were placed next to drums or containers with which they were incompatible. Rainfall, thermal expansion of wastes, or severe weather events could have caused additional releases into the environment. In addition before moving the trailer to a secure location access was unrestricted and there was potential for vandalism.

- 3) Threat of fire or explosion;

The trailer contained wastes which were incompatible. A 40-gallon poly drum was labeled hydrochloric acid, and there were several drums that contained strong bases. Other containers were labeled flammable, flammable toxic, and a sealed 16-ounce container labeled as a water deposit cleaner containing a solution of hydrofluoric acid. If the wastes described above were combined, the reaction could generate sufficient heat to cause a fire. This entire unstable situation posed a potential treat of fire or explosion during several potential weather conditions.

- 4) The availability of other appropriate federal or state response mechanisms to respond to the release;

On June 11, 1999, Illinois EPA requested U.S. EPA, Region V's assistance with the Granite City Trailer site. The Illinois State Police also indicated their desire to have the unstable condition disposed of properly. The State of Illinois did not have the funds to undertake removal of the hazardous wastes found at this site.

IV. ENDANGERMENT DETERMINATION

Given the conditions at the Granite City Trailer site, the nature of the hazardous substances on site, and the exposure pathways described in Sections II and III above, actual or threatened

releases of hazardous substances from this site, if not addressed by implementing the response actions in this Action Memorandum, may have presented an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC completed the following emergency removal actions to mitigate threats posed by the presence of uncontrolled hazardous waste at the Granite City Trailer site:

- 1) Developed and implemented a Site Health and Safety Plan, including an air monitoring plan;
- 2) Characterized, removed and properly disposed of hazardous waste and hazardous substances (including all small containers) in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.400)

The nature of this emergency removal action, including complete disposal of the trailer contents, eliminated the need for any post-removal site control. Therefore, the OSC did not need to plan for the provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP.

The detailed cleanup contractor cost is presented in Attachment 1 and actual project costs are summarized below:

REMOVAL PROJECT COSTS

EXTRAMURAL COSTS:

Cleanup Contractor	\$27,665
START	<u>3,618</u>
TOTAL EXTRAMURAL COSTS	\$31,283

INTRAMURAL COSTS:

U.S. EPA Direct Costs \$30 X [(90 Regional Hours)+ 9 HQ Hours]	\$ 2,970
U.S. EPA Indirect Costs \$65 X (90 Regional Hours)	<u>5,850</u>

TOTAL INTRAMURAL COSTS	8,820
	=====
TOTAL REMOVAL PROJECT CEILING ESTIMATE	\$40,103

The response actions described in this memorandum directly addressed the actual or threatened release at the site of a hazardous substance, or of a pollutant, or of a contaminant which may have posed an imminent and substantial endangerment to public health or welfare or to the environment.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) were complied with to the maximum extent practicable. All hazardous substances, pollutants or contaminants removed off site pursuant to this removal action for treatment, storage and disposal were treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-site Rule, 40 C.F.R. § 300.440, 58 Federal Register 49215 (Sept. 22, 1993).

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Continued risk to public health and the environment would have result if no action or delayed action ensued.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Granite City Trailer site located in Granite City, Madison County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. Conditions at the site met the NCP Section 300.415(b)(2) criteria for a removal and I recommend your written approval of the removal action that was completed in July 1999. The total project ceiling is \$40,103. Of this an estimated \$31,283 was used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: Richard C Karl DATE: 9-7-00
Richard Karl, Chief, Emergency Response Branch

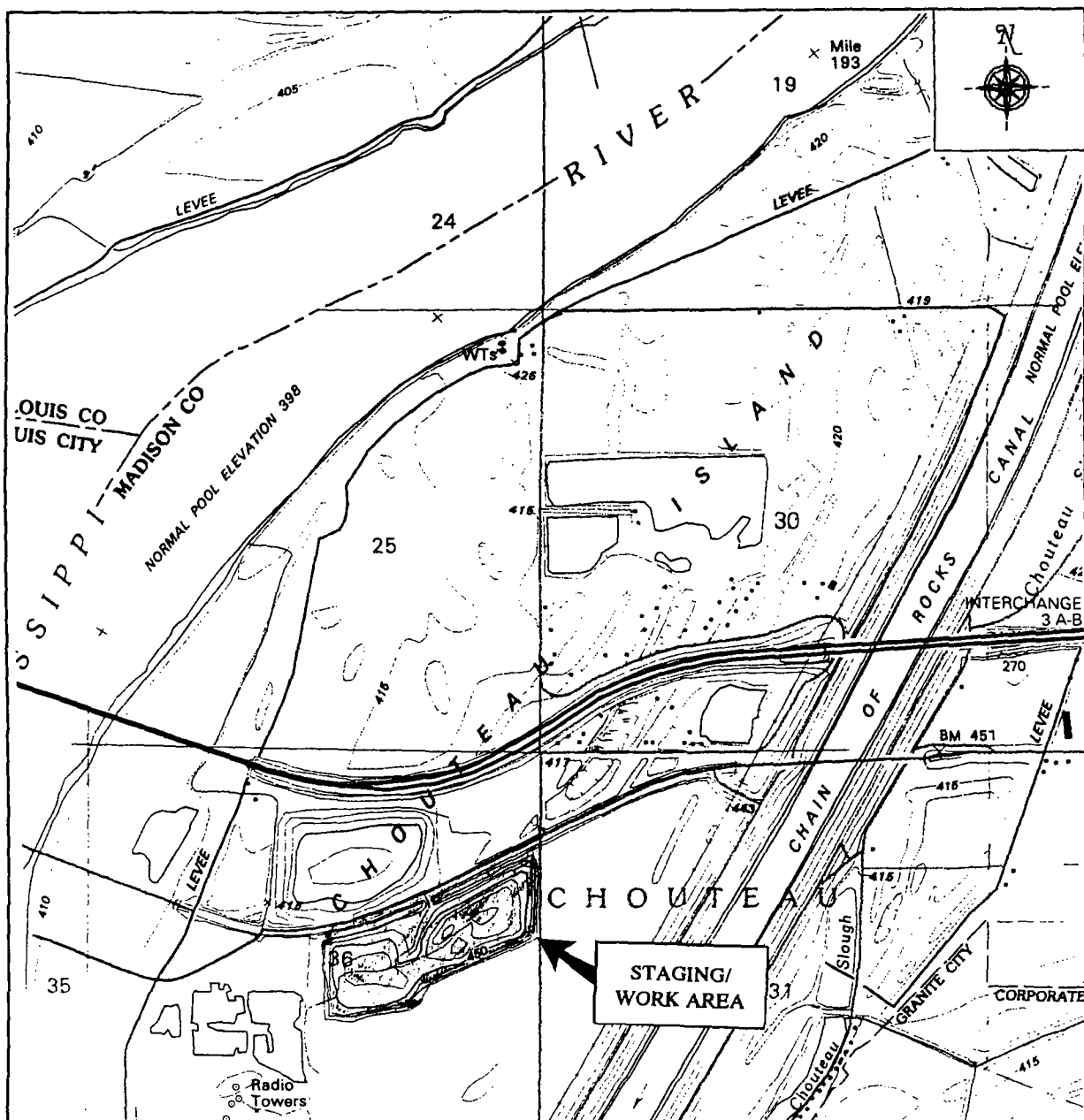
DISAPPROVE: _____ DATE: _____
Richard Karl, Chief, Emergency Response Branch

Figure 1. Site Location Map

Attachments:

- I. Detailed Cleanup Contractor Estimate
- II. Enforcement Confidential Addendum
- III. Administrative Record Index

cc: K. Mould, U.S. EPA 5202G
M. Chezik, U.S. Department of Interior, w/o Enf. Addendum
T. Miller, Illinois EPA, w/o Enf. Addendum
T. Skinner, Illinois EPA, w/o Enf. Addendum
S. Davis, Illinois DNR, w/o Enf. Addendum:



Quadrangle Location



ecology and environment, inc.

**Superfund Technical Assessment and Response Team
Region 5**

501 W. DeYoung Center, Suite 3, Marion, Illinois 62959

TITLE	Site Location Map	FIGURE	1
WTS	Granite City Trailer	SCALE	1:24,000
CITY	Granite City	STATE	Illinois
SOURCE	U.S.G.S. 7.5 Minute Topographic Series, Columbia Bottom Quadrangle, MO - IL	TDD	S05-9906-011
		DATE	1994
		REVISED	N/A

(Attachment I)
DETAILED CLEANUP CONTRACTOR ESTIMATE
GRANITE CITY TRAILER SITE
GRANITE CITY, MADISON COUNTY, ILLINOIS

The estimated cleanup contractor costs necessary to complete the removal action at the Granite City Trailer Site are as follows:

Personnel & Equipment	\$11,365
Materials	\$ 2,357
Transportation & Disposal	\$13,943
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TOTAL	\$27,665

ATTACHMENT II

ENFORCEMENT CONFIDENTIAL ADDENDUM

**REDACTED
(2 PAGES)**

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

ATTACHMENT III
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION
ADMINISTRATIVE RECORD
FOR
GRANITE CITY TRAILER SITE
GRANITE CITY, MADISON COUNTY, ILLINOIS

ORIGINAL
AUGUST 24, 2000

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	06/16/99	Turner, K., U.S. EPA	Durako, J.	Letter re: Staging of Abandoned Trailer on Chain-of-Rocks Landfill Facility Property	1
2	06/18/99	Powell, T., Illinois EPA/ Collinsville OCS/ERU	Illinois EPA/ OCS/ERU File	Memorandum re: Abandoned Trailer at Canal Motel in Granite City w/ Attached Inspection Photos	8
3	06/23/99	Turner, K., U.S. EPA	Distribution List	POLREP #1 (Initial) for the Granite City Trailer Site	5
4	10/29/99	Ecology and Environment, Inc.	U.S. EPA	Letter Report for the Granite City Trailer Site	20
5	00/00/00	Turner, K., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Written Approval of the Time- Critical Removal Action at the Granite City Trailer Site (PENDING)	